

US BANKRUPTCY COURT DISTRICT OF MASSACHUSETTS

In re: Henry D. Goldman and Cheryl E. Goldman

Debtor s

Chapter 7

Case No. 1:12-bk-20059

SECOND MOTION TO AVOID JUDICIAL LIEN

Debtors commenced this case on 12/31/2012 by filing a voluntary petition for relief under Chapter 7 of Title 11 of the United States Code.

Pursuant to 28 U.S.C. § 1334, this court has jurisdiction over this motion pursuant to 11 U.S.C. § 522(f) to avoid and cancel a judicial lien held by **Midland Funding LLC** on real property used as the debtor's residence.

On 10/02/2012, creditor recorded a judicial lien against debtors' residence at: 33
Old Country Way, Weymouth, MA 02188 (Book 30515 Page 575-576 Norfolk
County Registry of Deeds Dedham, MA) (attached as Exhibit A)

Debtors state the following in compliance with the provisions of MLBR 4003-1:

- (1) The holder of the judicial lien is Midland Funding LLC located at 8875

 Aero Drive, Suite 200, San Diego CA 92123 (represented by Kenneth C Wilson Esq,

 Lustig Glaser & Wilson PC, PO Box 549287, Waltham MA 02454-9287);
- (2) The judicial lien was granted on 09/25/2012 by Quincy District Court, One Dennis Ryan Pkwy, Quincy MA 02169;
 - (3) The lien is held in the amount of \$13,417.99;